

Matthew L. Rollin (SBN 332631)
SRIPLAW, P.A.
 8730 Wilshire Boulevard
 Suite 350
 Beverly Hills, California 90211
 323.452.5600 – Telephone
 561.404.4353 – Facsimile
matthew.rollin@sriplaw.com

Counsel for Plaintiff
 Viral DRM LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

VIRAL DRM LLC,

 Plaintiff,

 v.

 MARYNA LIETUCHEVA,

 Defendant.

CASE NO. 3:23-cv-04300-JSC

**DECLARATION OF BRANDON CLEMENT
 IN FURTHER SUPPORT OF PLAINTIFF'S
 MOTION FOR FINAL DEFAULT**

I, Brandon Clement, declare and say:

1. I am the principal and owner of Viral DRM LLC (“Viral DRM”). Viral DRM is a Mississippi limited liability company that helps clients protect the copyright to video content, especially content depicting extreme weather events. I am also CEO of WXchasing LLC, a Mississippi limited liability company. Both companies are affiliated with Live Storms Media LLC, an Alabama limited liability company that acts as a licensing broker of video content owned by or exclusively licensed to Viral DRM and WXchasing.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the exclusive license between Viral DRM and a videographer whose work is at issue in this case.

3. The agreement grants an exclusive worldwide license to Viral DRM to display, store, transmit and distribute the videographer’s works. It was understood that the display right would also include the performance right since the performance right is equivalent to the display right for

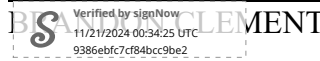
SRIPLAW
CALIFORNIA ♦ GEORGIA ♦ FLORIDA ♦ INDIANA ♦ NEW YORK ♦ TENNESSEE ♦ TEXAS

1 motion pictures. The "ownership" of copyright is retained by the author in the agreement. However,
2 since the rights licensed by Viral DRM are exclusive, it is my understanding that Viral DRM has the
3 display/performance and distribution/transmission rights under the agreement.

4 4. I certify that Viral DRM has a written agreement, with identical terms, signed for
5 each of the videographers at issue in this lawsuit.

6
7 Executed on November 20, 2024

8 *Michael Brandon Clement*

9
10  **MENT**